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FEDERAL COMMUNICATIONS COMMISSION

GTE Service Corporation OFFICE OF THE SECRETARY

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Carol L. Bjelland
Director
Regulatory Matters
July 17, 1997

EX PARTE OR LATE FILED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

RE: Ex Parte: CC Docket No. 96-115/
WT Docket No. 96-162

Dear Mr. Caton:

This letter shall serve as notification that Gary Carswell, Mike Drew, Charon Harris, Rebecca Talcott, Dennis Murawski and Carol Bjelland, representing GTE, participated in a meeting with Dorothy Attwood, Jeannie Su, and Raelynn Tibayan of the Policy and Program Planning Division, and David Krech of the Commercial Wireless Division. The purpose of the meeting was to reiterate GTE's position concerning the various CPNI issues raised in the above-referenced proceedings and as reflected in materials previously submitted on the record. GTE also responded to questions from the Commission's Staff with respect to technical and administrative implications arising from implementation of CPNI requirements. The attached material was used to facilitate the discussion of these issues.

Please include this letter, and the attached discussion material, in the record of this proceeding in accordance with the Commission's rules concerning ex parte communications. Questions concerning this matter should be directed to the undersigned.

Sincerely,



Carol L. Bjelland

Attachment

CC: FCC Staff Meeting Participants

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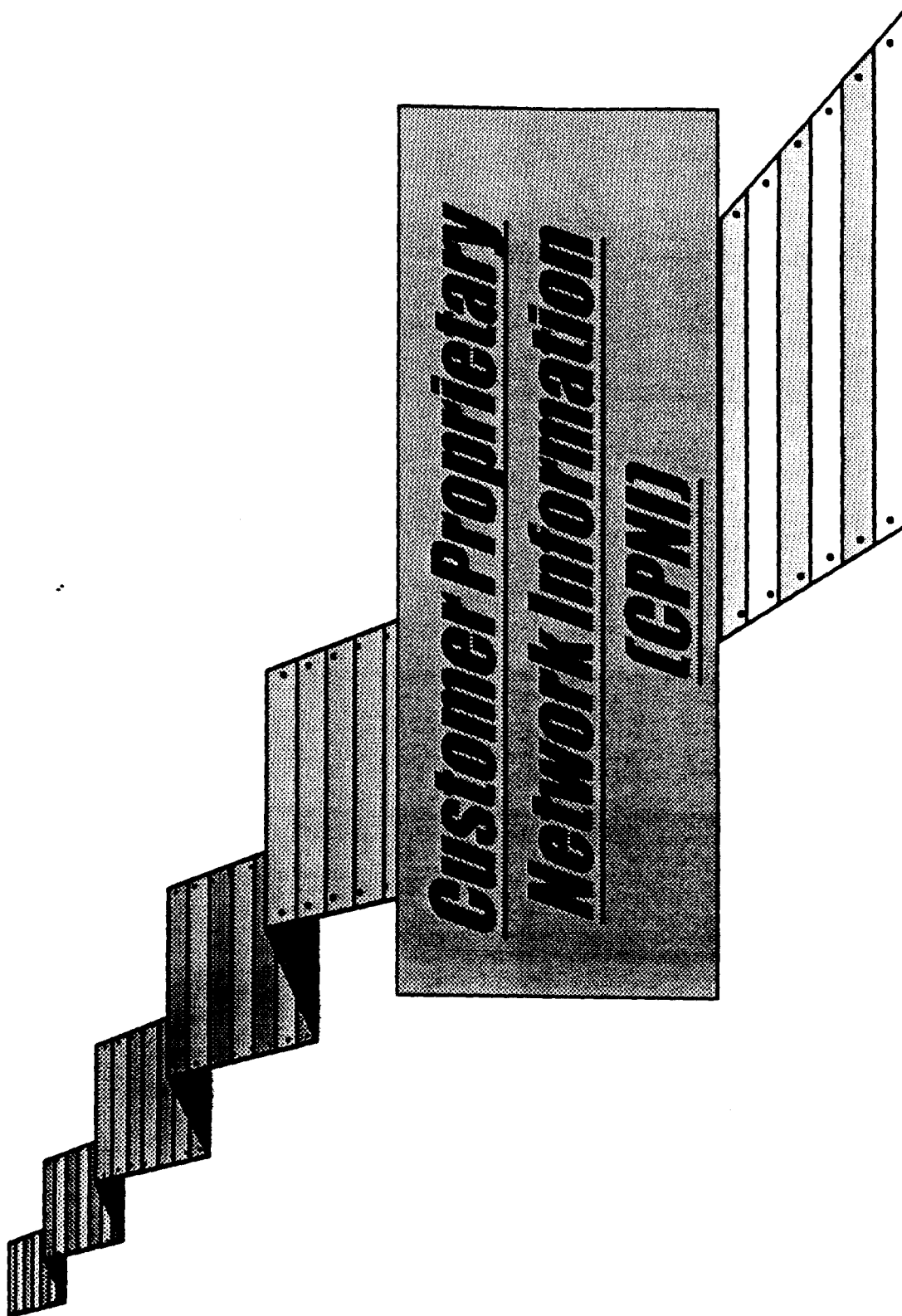
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▼ ***Implementation of Section 222***



- ✓ Customer's reasonable expectations of privacy must be respected
- ✓ Customer's desire for ease of one-stop shopping also must be considered
- ✓ Government does not need to mandate or dictate changes in the customer-carrier relationship

▼ ***Customer-identified data***



- ✓ Disclosure and/or use of this kind of data should comport with customers' wishes
- ✓ Carriers should be allowed to furnish customer-identified CPNI within the corporate family after appropriate notification of customers' right to restrict such use

▼ ***Alternative Approaches***



✓ **Affirmative written request**

- ◆ Carrier only discloses CPNI to an outside party when the customer has clearly directed, *in writing*, to do so

✓ **Approval of the customer**

- ◆ If information stays within the corporate family, then an affirmative written request is not necessary
- ◆ GTE's "opt in" approach allows for a hassle-free way for customers to approve use of their CPNI data

▼ ***Computer Inquiry III CPNI rules***



- ✓ Computer Inquiry III rules have different purpose than Section 222 of Telecom Act
 - ◆ Limited to marketing restrictions within regulated LEC for promotion of enhanced services and CPE
 - ◆ Does not address privacy of customer information between competing telecommunications providers
- ✓ No longer appropriate in competitive telecom environment

▼ ***CI III CPNI rules should be eliminated*** **GTE**

- ✓ Apply only to GTE and the RBOCs and are, therefore, discriminatory
- ✓ Are contrary to the goals of the Telecom Act by limiting information flow about advanced telecom services to GTE's customers
- ✓ New Section 222 rules – where customers control their CPNI – are all that is needed